



1 Plaintiffs and Defendants jointly request that the Court extend the deadline for Plaintiffs to  
2 file a motion for costs of litigation (including reasonable attorneys' fees) for activities performed  
3 prior to the entry of the Consent Decree, Dkt. 38 at 5, ¶ 9, by 30 days, from January 21, 2020, to  
4 February 20, 2020. The parties are engaged in settlement discussions regarding Plaintiffs' claim for  
5 costs of litigation that may avoid the need for the Court to adjudicate the matter. Additional time is  
6 needed so that the parties may continue these ongoing discussions.

7 Presented this 15th day of January, 2020, by:

8 s/ Jeremy C. Lieb

Jeremy C. Lieb (WSB #47219)  
9 Erik Grafe (AK Bar #0804010) (*pro hac vice*)  
EARTHJUSTICE  
10 441 W 5th Avenue, Suite 301  
Anchorage, AK 99501  
11 T: 907.277.2500  
F: 907.277.1390  
12 E: jlieb@earthjustice.org  
egrafe@earthjustice.org

13 s/ Kristen L. Boyles

14 Kristen L. Boyles (WSB #23806)  
EARTHJUSTICE  
15 705 Second Avenue, Suite 203  
Seattle, WA 98104  
16 T: 206.343.7340  
F: 206.343.1526  
17 E: kboyles@earthjustice.org

18 *Attorneys for Citizens for Clean Air, a project of Alaska*  
19 *Community Action on Toxics, and Sierra Club*

1 s/ Gus Maxwell

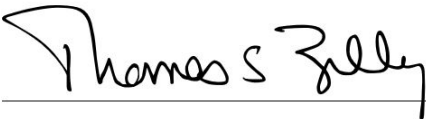
2 Gus Maxwell  
3 U.S. Department of Justice  
4 Environmental & Natural Resources Division  
5 Environmental Defense Section  
6 P.O. Box 7611  
7 Washington, DC 20044  
8 T: 202.514.0135  
9 F: 202.616-2426  
10 E: gustavus.maxwell@usdoj.gov

11 *Counsel for Defendants*

12 It is so ordered.

13 Dated this 17th day of January, 2020.

14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26



Thomas S. Zilly  
United States District Judge